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Attorneys for Defendant  
ROKID, INC.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

JUN FU,

Plaintiff,

v.

ROKID, INC., and DOES 1-25,  
Defendants.

Case No. \_\_\_\_\_

**DECLARATION OF KATHLEEN B.  
RONEY IN SUPPORT OF  
DEFENDANT ROKID, INC.'S  
REMOVAL OF ACTION TO THE  
UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF  
CALIFORNIA PURSUANT TO 28  
U.S.C. §§ 1332 AND 1441 (DIVERSITY)**

(Filed concurrently with Notice of  
Removal; Declaration of Liang Guan;  
Certification and Notice of Interested  
Parties; and Civil Cover Sheet)

State Complaint Filed: June 9, 2023  
Complaint Served: Not Served

I, Kathleen B. Roney, declare and state as follows:

1. I am an attorney at the law firm Jackson Lewis P.C., counsel of record for Defendant ROKID, INC. ("Defendant"), and I am an attorney responsible for representing Defendant in this matter. I make this declaration in support of Defendant's Notice of Removal.

2. The following is based on my personal knowledge, except for those matters stated

1 upon information and belief, and if called as a witness, I could and would competently testify to  
2 the facts contained herein.

3 3. I am informed and believe that on August 17, 2023, Plaintiff JUN FU ("Plaintiff")  
4 filed a civil complaint against Defendant in the Superior Court of the State of California, in and  
5 for the County of San Mateo, entitled *JUN FU v. ROKID, INC. and DOES 1 through 25, Case No.*  
6 *23-CIV-03872*. A true and correct copy of the Complaint is attached as **Exhibit A**. Attached as  
7 **Exhibit B** is a true and correct copy of a Summons issued on August 17, 2023. **Exhibit C**, attached  
8 hereto, is a Civil Case Cover Sheet for this matter.

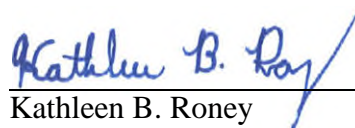
9 4. As of the date of this Declaration, the attached Exhibits A and B constitute all of  
10 the pleadings and papers currently on file in this matter, and no further proceedings have occurred  
11 in the state court.

12 5. I am informed and believe that Plaintiff has not served Defendant with the  
13 Summons and Complaint. As of the date of Defendant's removal, no Proof of Service of the  
14 Summons has been filed.

15 6. On August 21, 2023, Plaintiff's counsel informed me via email that Plaintiff is  
16 seeking damages in excess of \$1,000,000.

17  
18 I declare under penalty of perjury under the laws of the United States that the foregoing is  
19 true and correct.

20 Executed this 23rd day of August, 2023 at San Francisco, California.

21  
22   
23 Kathleen B. Roney

24 4886-3830-3866, v. 2